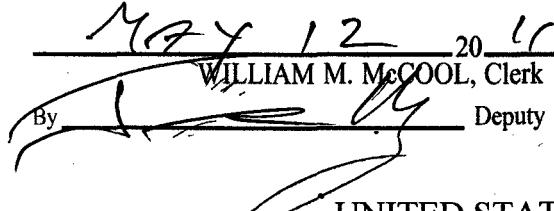


1
2 Presented to the Court by the foreman of the
3 Grand Jury in open Court, in the presence of
4 the Grand Jury and FILED in the U.S.
5 DISTRICT COURT at Seattle, Washington.

6 
7 May 12 2011
8 WILLIAM M. McCOOL, Clerk
9 By 
10 Deputy

11
12
13 UNITED STATES DISTRICT COURT
14 WESTERN DISTRICT OF WASHINGTON
15 AT TACOMA

16 UNITED STATES OF AMERICA

17 CR 11 NO. 5246 BHS

18 Plaintiff, }
19 v. }
20 SABIR SHABAZZ, }
21 Defendant. }
22
23

16 The Grand Jury charges that:

17 **COUNT 1**

18 **(Conspiracy to Engage in Sex Trafficking of Minors)**

19 In or around July 2010, and continuing through in or about September 2010, within
20 the Western District of Washington and elsewhere, SABIR SHABAZZ, Shadina Rice,
21 and others known and unknown, in and affecting interstate and foreign commerce, did
22 knowingly conspire and agree with each other to commit offenses against the United
23 States set forth in Title 18, United States Code, Sections 1591(a)(1) and 1591(a)(2), as to
24 juvenile females JV-1 and JV-2, that is,

25 a. To recruit, entice, harbor, transport, provide, obtain, and maintain, by
26 any means, JV-1 and JV-2, and,

1 b. To benefit financially and receive anything of value from
2 participation in a venture which is intended to recruit, entice, harbor,
3 transport, provide, obtain, and maintain, by any means, JV-1 and JV-2,
4 with knowledge and in reckless disregard of the fact that JV-1 and JV-2 had not attained
5 the age of 18 years old, and would be caused to engage in a commercial sex act.

6 All in violation of Title 18, United States Code, Sections 1591(a)(1), 1591(a)(2),
7 and 1594(c).

8 **COUNT 2**

9 **(Sex Trafficking of a Minor)**

10 In or around about July 2010, and continuing through in or about September 2010,
11 in Pierce County, within the Western District of Washington, and elsewhere, SABIR
12 SHABAZZ knowingly, in and affecting interstate and foreign commerce, and aiding and
13 abetting others, did recruit, entice, harbor, transport, provide, obtain, and maintain by any
14 means, JV-1, and, did benefit financially and receive anything of value from participation
15 in a venture which was intended to recruit, entice, harbor, transport, provide, and obtain
16 JV-1, with knowledge and in reckless disregard of the fact that JV-1 had not attained the
17 age of 18 years old, and would be caused to engage in a commercial sex act.

18 The Grand Jury alleges that this offense was committed during and in furtherance
19 of the conspiracy charged in Count 1 above.

20 All in violation of Title 18, United States Code, Sections 2, 1591(a)(1), 1591(a)(2),
21 and 1591(b)(1).

22 **COUNT 3**

23 **(Sex Trafficking of a Minor)**

24 In or around July 2010 and continuing through in or about September 2010, in
25 Pierce County, within the Western District of Washington, and elsewhere, SABIR
26 SHABAZZ knowingly, in and affecting interstate and foreign commerce, and aiding and
27 abetting others, did recruit, entice, harbor, transport, provide, obtain, and maintain by any
28 means, JV-2, and did benefit financially and receive anything of value from participation

1 in a venture which was intended to recruit, entice, harbor, transport, provide, obtain, and
2 maintain JV-2, with knowledge and in reckless disregard of the fact that JV-2 had not
3 attained the age of 18 years old, and would be caused to engage in a commercial sex act.

4 The Grand Jury alleges that this offense was committed during and in furtherance
5 of the conspiracy charged in Count 1 above.

6 All in violation of Title 18, United States Code, Sections 2, 1591(a)(1), 1591(a)(2),
7 and 1591(b)(1).

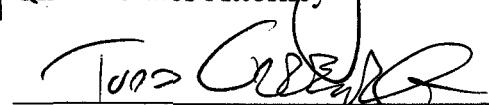
8 A TRUE BILL:

9 DATED: 5/12/11

10 Signature of Foreperson redacted pursuant
11 to the policy of the Judicial Conference of
12 the United States.

13

14 
15 JENNY A. DURKAN
16 United States Attorney

17 
18 TODD GREENBERG
19 Assistant United States Attorney

20 
21 BRUCE F. MIYAKE
22 Assistant United States Attorney